

BEFORE THE
Federal Communications Commission
WASHINGTON, D.C.

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

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In the Matter of)
)
Establishment of an Advisory)
Committee to Negotiate Proposed)
Regulations Governing the)
Provision of Mobile Satellite)
Services in the 1610-1626.5 MHz)
and 2483.5-2500 MHz Bands)

CC Docket No. 92-166

To: The Commission

COMMENTS OF AMSC SUBSIDIARY CORPORATION
AND STATEMENT OF INTENTION TO PARTICIPATE

AMSC Subsidiary Corporation ("AMSC"), by its attorneys, hereby submits its comments on the proposed establishment of an Advisory Committee to negotiate regulations appropriate to the provision of Mobile Satellite Service ("MSS") in the 1610-1626.5 MHz and 2483.5-2500 MHz bands, which presently are allocated domestically to the Radiodetermination-Satellite Service ("RDSS").^{1/} AMSC believes the formation of an Advisory Committee that would discuss all the issues regarding the provision of MSS in these bands is appropriate, and AMSC herein states its intention to participate actively in the work of such a Committee.

On June 3, 1991, AMSC submitted an application for authority to integrate frequencies from the 1610-1626.5 MHz band into the U.S. MSS system. Five other entities -- Constellation

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^{1/} These Comments are submitted pursuant to the Commission's Public Notice, DA 92-1085 (August 7, 1992).

Communications, Inc., Ellipsat Corporation, Loral Qualcomm Satellite Services, Inc., Motorola Satellite Communications, Inc., and TRW Inc. -- also filed applications for satellite systems that would operate in the RDSS bands. These five applicants propose to offer MSS service via constellations of non-geostationary satellites.

On September 4, 1992, the Commission released a Notice of Proposed Rule Making and Tentative Decision ("Notice") proposing to allocate the 1610-1626.5 MHz and 2483.5-2500 MHz bands to MSS.^{2/} The Notice pointed out that these allocations are consistent with the allocation of these bands internationally to MSS at the 1992 World Administrative Radio Conference, and noted the "important economic and service innovations that could be provided by both geostationary and non-geostationary MSS systems" in these bands.^{3/}

The Commission proposes to establish, under the Federal Advisory Committee Act and the Negotiated Rulemaking Act of 1990, an Advisory Committee to negotiate appropriate technical rules for the provision of MSS in the 1610-1626.5 MHz and 2483.5-2500 MHz bands. The Commission has identified AMSC, as one of the six applicants for systems in these bands, as having a potential interest in the rulemaking sufficient to justify its representation on the Committee.^{4/}

^{2/} Notice of Proposed Rule Making and Tentative Decision, ET Docket No. 92-28, FCC 92-358 (September 4, 1992).

^{3/} Id. at 7, para. 16.

^{4/} Public Notice, DA 92-1085 (August 7, 1992), at 3, para. 8.

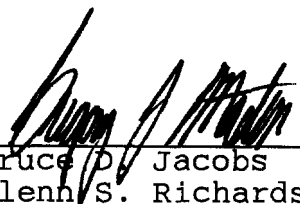
AMSC believes the establishment of an Advisory Committee would be appropriate. The Advisory Committee would facilitate the discussion of the many important technical issues with respect to the MSS systems proposed for the 1610-1626.5 MHz and 2483.5-2500 MHz bands, including issues concerning sharing of the bands among the proposed MSS systems and between the proposed MSS systems and other users.

AMSC states its intention to actively participate in good faith in the proposed Advisory Committee's development of these rules. AMSC respectfully designates the following person as its Committee representative:


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Respectfully submitted,

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Dated: September 14, 1992

CERTIFICATE OF SERVICE

I, Valerie A. Mack, a secretary in the law firm of Fisher, Wayland, Cooper and Leader, hereby certify that true copies of the foregoing "Comments of AMSC Subsidiary Corporation and Statement of Intention to Participate" were sent this 14th day of September, 1992, by first class United States mail, postage prepaid, to the following:

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